

1 **WEILAND GOLDEN GOODRICH LLP**
2 Jeffrey I. Golden, State Bar No. 133040
3 jgolden@wgllp.com
4 Faye C. Rasch, State Bar No. 253838
5 frasch@wgllp.com
6 650 Town Center Drive, Suite 600
7 Costa Mesa, California 92626
8 Telephone 714-966-1000
9 Facsimile 714-966-1002
10
11 Attorneys for Thomas H. Casey,
12 Chapter 7 Trustee
13
14

8 **UNITED STATES BANKRUPTCY COURT**
9
10 **CENTRAL DISTRICT OF CALIFORNIA**
11
12 **SANTA ANA DIVISION**

13 In re Case No. Case No. 8:16-bk-15156-CB
14 779 STRADELLA, LLC, a Delaware limited
15 liability company, Chapter 7
16 Debtor.
17
18

19 THOMAS H. CASEY, Chapter 7 Trustee of
20 the Estate 779 Stradella, LLC
21 Plaintiff,
22 v.
23

24 PAUL J. MANAFORT, an individual, and
25 JEFFREY YOHAI, an individual,
26
27 Defendants.
28

Adv. No. 8:18-ap-01076-CB
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**STIPULATION OF VOLUNTARY
DISMISSAL OF ADVERSARY
PROCEEDING**

24 Plaintiff Thomas H. Casey, Chapter 7 Trustee of the bankruptcy estate of 779
25 Stradella, LLC and defendant Jeffrey Yohai hereby state as follows:

26 1. All parties who have appeared may stipulate to the dismissal of a party
27 without a court order. Fed. R. Civ. Proc. 41(a)(1)(A)(ii); Fed. R. Bankr. Proc. 7041.

1 2. Pursuant to Rule 41(a), the undersigned parties hereby stipulate to the
2 dismissal of the above-captioned adversary proceeding, with prejudice.

3 3. The dismissal of the above-captioned adversary proceeding shall be without
4 prejudice and further that if Paul J. Manafort fails to comply with the settlement agreement
5 reached with the Plaintiff, the above-captioned adversary proceeding may be reinstated
6 without prejudice for statute of limitations or laches.

7
8
9 Dated: February 4, 2020

WEILAND GOLDEN GOODRICH LLP

10
11 By: /s/ Jeffrey I. Golden

12 JEFFREY I. GOLDEN
13 Attorneys for Chapter 7 Trustee,
14 Thomas H. Casey

15
16 Dated: January , 2020

17 THE HINDS LAW GROUP APC

18
19 By: _____

20 JAMES ANDREW HINDS, JR.
21 Attorneys for Jeffrey Yohai

1 2. Pursuant to Rule 41(a), the undersigned parties hereby stipulate to the
2 dismissal of the above-captioned adversary proceeding, with prejudice.

3 3. The dismissal of the above-captioned adversary proceeding shall be without
4 prejudice and further that if Paul J. Manafort fails to comply with the settlement agreement
5 reached with the Plaintiff, the above-captioned adversary proceeding may be reinstated
6 without prejudice for statute of limitations or laches.

7

8

9 Dated: January , 2020

WEILAND GOLDEN GOODRICH LLP

10

11

By:

12 JEFFREY I. GOLDEN
13 Attorneys for Chapter 7 Trustee,
14 Thomas H. Casey

15

16

17

Dated: January 22, 2020

THE HINDS LAW GROUP, APC

18

19

By:

20 JAMES ANDREW HINDS, JR.
21 Attorneys for Jeffrey Yohai

22

23

24

25

26

27

28

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

**650 Town Center Drive, Suite 600
Costa Mesa, California 92626**

A true and correct copy of the foregoing document entitled (specify): Stipulation of Voluntary Dismissal of Adversary Proceeding

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) February 4, 2020, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (date) February 4, 2020, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) February 4, 2020, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Served by Personal Delivery

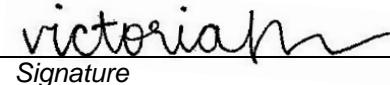
Honorable Catherine E. Bauer
United States Bankruptcy Court
Central District of California
Ronald Reagan Federal Building and Courthouse
411 West Fourth Street, Suite 5165 / Courtroom 5D
Santa Ana, CA 92701-4593

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

2/4/2020
Date

Victoria Rosales
Printed Name


Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

Ryan W Beall rbeall@wgflp.com, vrosales@wgllp.com;kadele@wgllp.com
Thomas H Casey (TR) msilva@tomcaseylaw.com, thc@trustesolutions.net
Marc C Forsythe kmurphy@goeforlaw.com, mforsythe@goeforlaw.com;goeforecf@gmail.com
Jeffrey I Golden jgolden@wgllp.com, kadele@wgllp.com;vrosales@wgflp.com;cbmeeker@gmail.com
James Andrew Hinds jhinds@hindslawgroup.com, mduran@hindslawgroup.com
Faye C Rasch frasch@wgllp.com, kadele@wgllp.com;vrosales@wgllp.com
David B Shemano dshemano@shemanolaw.com
United States Trustee (SA) ustpregion16.sa.ecf@usdoj.gov